

STANDARD CIVIL VOIR DIRE

1. Introduction
2. Read statement of the case.
 - Have any of you read or heard anything about this case from any source whatsoever?
 - Given this brief description of the facts, is there anything about this case that would cause you to believe that you could not consider the evidence fairly and impartially according to the law?
3. Introduce self and staff: Vera Noble, Kristen Parris, Merilyn Sanchez, Law Clerk, Extern(s). Do any of you know any member of my staff on any basis, social, professional, or otherwise?
4. The Plaintiff(s) is/are represented by _____ of the law firm of _____. Counsel please stand.
 - Do any of you know Plaintiff's counsel, or any of the employees in his/her office on any basis, social, professional, or otherwise?
 - Counsel, please introduce your client and those present at the counsel table. Do any of you know these individuals on any basis, social, professional or otherwise?
 - If a company or corporation: Have any of you ever had a business or employment relationship of any kind with the plaintiff?
5. The defendant(s) is/are represented by _____ of the law firm of _____. Counsel please stand.
 - Do any of you know the Defendant's counsel or any employees of his/her office on any basis, social, professional or otherwise?
 - Counsel, please introduce your client and those present at the counsel table. Do any of you know these individuals on any basis, social, professional, or otherwise?
 - If a company or corporation: have any of you ever had a business or employment relationship of any kind with the defendant?

6. The witnesses who may be called during this trial are: (See Witness List):
 - Do any of you know or think you might know any of these witnesses?
7. Is there anything that has occurred to any of you, or are there any facts that you think we should know about, that might have a bearing on your judgment in this case?
8. Do any of you have strong feelings either for or against a party who brings a lawsuit?
9. This is a civil case which is to be decided by the preponderance of the evidence [clear and convincing on some issues]. This is different from a criminal case where the government has to prove its case beyond a reasonable doubt. Does anyone have a problem applying a lower burden of proof than that used in a criminal case?
10. Have any of you or members of your family been a party or witness in any litigation (excluding domestic relations, traffic, or probate)?
11. Do any of you or any of the members of your family have any legal training?
12. I will instruct you on the law at the conclusion of the case. If selected as a juror, you will take an oath to follow the law. Do any of you think you will have trouble following the law even if you may disagree with it?
13. Will you be able to render your verdict solely on the basis of the evidence presented during the trial, setting aside any personal beliefs, opinions, or biases you might have?
14. Did any of you know each other before this morning?
 - Do you think your acquaintance might affect your ability to deliberate and reach an independent decision in this case?
15. This case is expected to last ____ days. Will the length of this trial create an undue hardship for any of you?
16. I expect to conduct trial on these dates and times:
Tuesday through Friday
9:00 a.m. to 4:30 p.m. One hour break for lunch and two 15-20 minute breaks.

Would this schedule create any undue hardship for any of you?
17. Do any of you have any other reason whatsoever, such as a physical difficulty, a health problem or home problems that might interfere with our serving as a fair and impartial juror in this case?

18. We have handed you a list of questions. Please stand and answer the questions. The last question asks about your prior jury service. With respect to any juries on which you have served, please indicate the nature of the case and the outcome of the trial.
19. If there are any matters that you would rather discuss privately that may affect your ability to be a fair and impartial juror, please let me know at this time.
20. Counsel for the plaintiff, do you have any further questions at this time? Do you pass the panel?
21. Counsel for the defendant, do you have any further questions at this time? Do you pass the panel?